

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE

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ULTIMA SERVICES CORPORATION,

Plaintiff,

-against-

U.S. DEPARTMENT OF AGRICULTURE,  
U.S. SMALL BUSINESS ADMINISTRATION,  
SECRETARY OF AGRICULTURE, and ADMINISTRATOR  
OF THE SMALL BUSINESS ADMINISTRATION,

Defendants.  
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No. 2:20-cv-00041-  
DCLC-CRW

**REPLY STATEMENT OF MICHAEL ROSMAN**

1. I am the General Counsel for the Center for Individual Rights and an attorney for plaintiff Ultima Services Corporation (“Ultima”) in this action. I submit this reply statement in further support of Plaintiff’s motion for summary judgment.

2. Defendants claim in their opposing papers that they first learned of Ultima’s prior corporate structure – that Ultima was previously a subsidiary of another corporation, LUSA Associates – during discovery. Accompanying this statement as Exhibit 42 is a document produced by defendants during discovery, a form filled out by Ultima in 2018 regarding its size and plainly showing that it was a subsidiary of LUSA. Ex. 42 (US0062865).

3. During discovery, defendants sought, and Ultima produced, a great deal of documents concerning the personal financial condition of Ultima’s owner, Celeste Bennett. These included tax returns going back to 2015 and various loan applications that set forth her assets and liabilities.

I state under penalty of perjury that the foregoing is true and correct. Executed on July 19, 2022.

/s/ Michael E. Rosman  
Michael E. Rosman